

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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In Re: Methyl Tertiary Butyl Ether ("MTBE")
Products Liability Litigation

Master File No. 1:00-1898
MDL 1358 (SAS)
M21-88
ECF Case

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This document relates to the following case:

City of New York v. Amerada Hess Corp., et al.
Case No. 04 Civ. 3417

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**DECLARATION OF MARNIE E. RIDDLE IN SUPPORT OF PLAINTIFF CITY
OF NEW YORK'S MEMORANDUM OF LAW IN OPPOSITION TO
DEFENDANTS' JOINT MOTION *IN LIMINE* TO PRECLUDE PLAINTIFF
FROM OFFERING EVIDENCE OR ARGUMENT CONCERNING ANY POLICY
OR REQUIREMENT TO TREAT MTBE CONTAMINATION TO ANY LEVEL
OTHER THAN THE NEW YORK STATE MAXIMUM CONTAMINANT LEVEL**

Marnie E. Riddle, an attorney duly admitted *pro hac vice* to appear in this case, hereby
declares under penalty of perjury:

1. I am an attorney with the law firm of Sher Leff LLP, counsel for Plaintiff the City of New York ("the City") in the above-captioned matter. I submit this Declaration in support of Plaintiff City of New York's Opposition to Defendants' Joint Motion *in Limine* to Preclude Plaintiff from Offering Evidence or Argument Concerning Any Policy or Requirement to Treat MTBE Contamination to Any Level Other Than the New York State Maximum Contaminant Level (the "Opposition"). This declaration authenticates the exhibits attached hereto and relied on in the City's Opposition. In accordance with the Court's Individual Rules and Procedures, the exhibits have been excerpted to include only the relevant material. Copies of each of the exhibits appended hereto were made at my direction on or around May 26, 2009.

2. Attached as Exhibit 1 is a true and correct copy of selected pages from the Rebuttal

Report of Marnie A. Bell, P.E. ("Bell Rebuttal"), dated April 7, 2009.

3. Attached as Exhibit 2 is a true and correct copy of selected pages from the Recommended Standards for Water Works, 2003 Edition (Ten States, 2003).

4. Attached as Exhibit 3 is a true and correct copy of the Declaration of Steven C. Schindler in Opposition to Defendants' Motion to Exclude the Testimony of Harry T. Lawless, May 13, 2009.

5. Attached as Exhibit 4 is a true and correct copy of selected pages from the Deposition of James Roberts, April 17, 2009, taken in the above-captioned case.

6. Attached as Exhibit 5 is a true and correct copy of selected pages from the Deposition of Stephen Schindler, April 23, 2009, taken in the above-captioned case.

On this 26th day of May 2009, I hereby declare under penalty of perjury under the laws of the United States that the foregoing statements are true and correct.

Dated: San Francisco, California
May 26, 2009

/s/ MARNIE E. RIDDLE
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